Analysis of Policy Review Comments

Institute for Water Resources

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Sacramento District

Analysis of Policy Review Comments

Objectives

Analyze HQ review documentation

- Identify major recurring themes
- Evaluate effectiveness of review process
- Support improvements in guidance, training, models, etc.

Analysis of Policy Review Comments

Process

- HQ Review Packages for feasibility studies in WRDA ’96, ’99 and ’00
- IWR reports for 3 business lines
  - Flood damage reduction (R. Fristik)
  - Navigation (R. Fristik)
  - Ecosystem restoration (S. Miner)

Analysis of Policy Review Comments

Flood Damage Reduction

- Johnson Creek, TX
- Antelope Creek, NE
- Monarch-Chesterfield, MO
- Western Sarpy/ Clear Creek, NE
- Turkey Creek, KS
- Beargrass Creek, KY

Analysis of Policy Review Comments

Flood Damage Reduction

- Formulation
  - Non-structural alternatives
  - NED versus Selected Plans
  - Relationship to related actions
- Economics
  - Inclusion of all project costs
  - Calculation of benefits

Analysis of Policy Review Comments

Flood Damage Reduction

- Real Estate
  - Inadequate Real Estate Plan
    - Access/ Induced flooding
    - Compensability of relocations
    - LERRD description, credit and responsibilities
- Environmental
  - Description of mitigation
  - Compliance with major environmental laws
  - EIS format or content

Analysis of Policy Review Comments

Flood Damage Reduction

- Miscellaneous
  - Required documentation
  - ITR/legal review
  - Coordination with affected landowners

Analysis of Policy Review Comments

Navigation

- Port of Long Beach, CA
- Charleston Harbor, SC
- Jacksonville Harbor, FL
- Baltimore Harbor Anchorages and Channels, MD and VA

Analysis of Policy Review Comments

Navigation

- Use of Advanced Maintenance
- Without-Project Condition
- Inclusion of All Economic/ Project Costs
- Real Estate/ Cost-sharing for Disposal
- Required Documentation
- Discrepancies in Reports
- Background Information

Analysis of Policy Review Comments

Ecosystem Restoration

- Duwamish/Green River Basin, WA
- Hamilton Army Airfield, CA
- Jackson Hole, Snake River, WY
- Sand Creek Watershed, NE
- Tres Rios, AZ
- Wolf River, TN

Analysis of Policy Review Comments

Ecosystem Restoration

- Environmental Compliance
  - Section 404 compliance
- Real Estate
  - Nonstandard estates/ inappropriate easements
- Environmental Benefits
  - Additional description
- Recreation
  - Excessive/ inappropriate recreation features
- Cost-sharing
  - Recreation versus ER cost-sharing
- Monitoring and Adaptive Management
  - Additional description and justification

Analysis of Policy Review Comments

Ecosystem Restoration

- Range of Alternatives
- Required Sponsor Documentation
  - Letter of Intent
- ITR
  - Required documentation
- Items of Local Cooperation
  - Incomplete or inappropriate ILC
- Cost Estimates
- Discrepancies in Reports
  - Inconsistent acreages and costs

Analysis of Policy Review Comments

Summary

Recurring Comment Themes

- Real Estate
- Environmental Compliance
- Required Documentation
- Items of Local Cooperation
- Discrepancies
- Background Information

Analysis of Policy Review Comments

Summary

Value Added

- Changes to Projects
- Changes to Reports

Responsiveness

- Unspecific comments often elicit unsatisfying responses